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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REPORT ON
RESPONSES TO ONE HUNDRED
TWENTIETH OMNIBUS OBJECTION TO
CLAIMS AND REQUEST FOR ORDER BY
DEFAULT AS TO UNOPPOSED
OBJECTIONS**

[Re: Dkt. Nos. 13670, 13698, 13719, 13730]

**Regarding Objections Set for Hearing
May 24, 2023, at 10:00 a.m. (Pacific Time)**

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as
3 debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the
4 above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule
5 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District
6 of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing*
7 *Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Dkt No. 1996] (“**Case**
8 **Management Order**”), that the Court enter an order by default on the *Reorganized Debtors’ One*
9 *Hundred Twentieth Omnibus Objection to Claims (No Liability Claims)* [Docket No. 13670] (the
10 “**Omnibus Objection**”).

11 **RELIEF REQUESTED IN THE OMNIBUS OBJECTION**

12 The Omnibus Objection seeks to disallow and expunge the Proofs of Claim listed in Exhibit 1
13 to the Omnibus Objection.

14 **NOTICE AND SERVICE**

15 The Reorganized Debtors filed a Notice of Hearing with respect to the Omnibus Objection
16 [Docket No. 13672]. The Omnibus Objection was also supported by the declaration of Renee Records
17 [Docket No. 13671]. The Omnibus Objection, the Notice of Hearing, and the Declaration were served
18 as described in the *Certificate of Service of Alain B. Francoeur*, filed on April 20, 2023 [Docket
19 No. 13677]: each holder of a Claim listed on Exhibit 1 to the Omnibus Objection received a notice
20 customized to include the claim number, debtor, claim amount and priority, and the basis for
21 Reorganized Debtors’ objection with respect to the applicable Claim to be disallowed and expunged.

22 The deadline to file responses or oppositions to the Omnibus Objection has passed. The
23 Reorganized Debtors have received the following responses:

24

Docket No.	Claimant	Claim No.	Resolution
13698	Quentin Keen	67135	The Reorganized Debtors have reached a settlement with Claimant. The hearing on the Omnibus Objection will be taken off calendar pending documentation of the settlement.

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Docket No.	Claimant	Claim No.	Resolution
13719	Synergy Project Management, Inc.	72390	The Reorganized Debtors are investigating Claimant's response to the Omnibus Objection. The Reorganized Debtors have attempted to contact Claimant but have not received a response to date. Accordingly, the hearing on the Omnibus Objection with respect to this Claim will be continued to July 26, 2023.
13730	David Mitchell	2306	The Reorganized Debtors are investigating Claimant's response to the Omnibus Objection. Mr. Mitchell has agreed to continue the hearing on the Omnibus Objection with respect to this Claim to July 26, 2023.

DECLARATION OF NO OPPOSITION RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am an attorney with the law firm of Keller Benvenuti Kim LLP, co-counsel for the Reorganized Debtors.
2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no responses have been filed with respect to the Omnibus Objection except as described herein.
3. This declaration was executed in San Francisco, California.

WHEREFORE, the Reorganized Debtors hereby request entry of an Order disallowing and expunging the Proofs of Claim listed in **Exhibit 1** to this Request, which listed Claims are identical to those listed in Exhibit 1 to the Omnibus Objection, except as otherwise discussed above.

Dated: May 17, 2023

KELLER BENVENUTTI KIM LLP

By: /s/ Dara L. Silveira
Dara L. Silveira

Attorneys for Debtors and Reorganized Debtors

Exhibit 1

Original Creditor	Claim Transferred To:	Claim/Schedule To Be Disallowed and Expunged	Debtor	Date Filed/ Scheduled:	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Chemera Corporation (dba Chemistry Corporation)		813	PG&E Corporation and Pacific Gas and Electric Company	2/15/2019	\$0.00	\$0.00	\$0.00	\$20,000.00	\$20,000.00	Rule 2; No Liability Based on Investigation
Chemistry Corporation 11500 Dolan Road (Corner of Dolan Road & Highway 1)										
Moss Landing, CA 95039										
Jackson Rancheria Development Corporation		3002	PG&E Corporation and Pacific Gas and Electric Company	5/15/2019	\$0.00	\$0.00	\$0.00	\$160,513.00	\$160,513.00	No Liability Based on Investigation
Law Offices of Charles L. Hastings 4568 Feather River Dr., Suite A										
Stockton, CA 95219										
Jimenez-Padgett, Manuel Cord		59027	PG&E Corporation and Pacific Gas and Electric Company	10/17/2019	\$0.00	\$0.00	\$0.00	\$392,979.48	\$392,979.48	Amended and Superseded
Bar & Mudford LLP Estee Lewis #238358 1824 Court Street PO Box 994390										
Reading, CA 96001										
Ramirez, Hedger		8599	PG&E Corporation and Pacific Gas and Electric Company	9/9/2019	\$50,000.00	\$0.00	\$15,700.00	\$134,300.00	\$200,000.00	No Liability Based on Investigation
PO Box 1392										
San Juan Bautista, CA 95045										
Ramirez, Hedger		2676	PG&E Corporation and Pacific Gas and Electric Company	4/23/2019	\$150,000.00	\$0.00	\$50,000.00	\$0.00	\$200,000.00	No Liability Based on Investigation
PO BOX 1392										
San Juan Bautista, CA 95045										
Sutcliffe, Linda		4012	PG&E Corporation and Pacific Gas and Electric Company	7/23/2019	\$0.00	\$0.00	\$0.00	\$360,000.00	\$360,000.00	Barred by Statute of Limitations; No Liability Based on Investigation
15677 Betters Rd										
Madera, CA 93636										
Sutcliffe, Linda		1951	PG&E Corporation and Pacific Gas and Electric Company	4/1/2019	\$0.00	\$0.00	\$0.00	\$360,000.00	\$360,000.00	Barred by Statute of Limitations; No Liability Based on Investigation
15677 Betters Rd										
Madera, CA 93636										
Claims To Be Expunged Totals					\$200,000.00	\$0.00	\$65,700.00	\$1,427,792.48	\$1,693,492.48	
Count: 7										